

EXHIBIT A

Raimundo Declaration in Support of Google's Motion for
Protective Order and to Seal Exhibits

UNITED STATES DEPARTMENT OF LABOR
OFFICE OF ADMINISTRATIVE LAW JUDGES

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Office of Administrative Law Judges
San Francisco, Ca

OFFICE OF FEDERAL CONTRACT
COMPLIANCE PROGRAMS, UNITED
STATES DEPARTMENT OF LABOR,

Plaintiff,

Case No.: 2017-OFC-00004

v.

GOOGLE INC.,

Defendant.

**DECLARATION OF ANTONIO C. RAIMUNDO IN SUPPORT OF DEFENDANT'S
MOTION FOR PROTECTIVE ORDER AND TO SEAL EXHIBITS**

I, Antonio C. Raimundo, declare:

1. I have personal knowledge of the facts set forth below and, if called as a witness, can competently testify to them. I am an associate attorney with Jackson Lewis P.C., counsel for Defendant Google Inc.

2. The binders lodged under seal with Defendant's Motion for Protective Order and to Seal Exhibits (the "Motion") contain true and correct copies of Defendant's Exhibit 110 in this matter, as well as Plaintiff's Exhibits 216, 218, 219, 220, 221, and 222 in this matter. Google has lodged these unredacted copies of these exhibits so that the Court can consider them when ruling on the Motion.

3. On April 5, 2017 at 5:16 p.m. and on April 6, 2017 at 12:02 a.m., I emailed counsel for Plaintiff Office of Federal Contract Compliance Programs ("OFCCP"), and asked whether OFCCP would join in the Motion, or at a minimum, not oppose the Motion. In the April 6, 2017 email, I wrote the following:

We intend to ask the Court to issue a protective order and to seal Defendant's Exhibit 110 and Plaintiff's Exhibits 216, 218, 219, 220, 221, and 222. These exhibits contain confidential and proprietary Google documents relating to employee compensation, evaluation, and related topics. These documents are the product of years of work by Google HR, compensation, and/or engineering employees. The company's evaluation and comp practices/systems are part of Google's success, because they help the company attract and retain good employees. Disclosure of these documents would hurt Google, because its competitors would get access to how Google pays, evaluates, attracts, and retains its workforce. This is good cause to support sealing the exhibits.

4. As of the time of filing this declaration and Google's Motion, OFCCP has not advised whether it will oppose or join to the Motion.

5. On April 6, 2017, OFCCP filed an Amended Exhibit List, and informed Google in an email that it added two new Exhibits: Plaintiff's Exhibit 223 (Google's April 4, 2017 responses to OFCCP's First Set of Requests for Admission), and Plaintiff's Exhibit 224, which OFCCP stated is "Google's 2015 Affirmative Action Plan." OFCCP emailed a copy of Exhibit 223 to Google. However, as of the time of filing this declaration and Google's Motion, OFCCP has not provided Google a copy of Exhibit 224.

6. Attached as Exhibit A to this declaration are true and correct copies of the Exhibits Google requests the Court accept as the filed versions of Defendant's Exhibit 110, and Plaintiff's Exhibits 216, 218, 219, 220, 221, and 222.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Dated: April 6, 2017


Antonio C. Raimundo

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April, 2017, I caused true and correct copies of Google's Motion for Protective Order and to Seal Exhibits, Proposed Protective Order and Order Sealing Exhibits, Declaration of Frank Wagner, Declaration of Antonio C. Raimundo, and Defendant's Lodging of Exhibits Under Seal to be served by sending copies of the same via email, pursuant to the parties' agreement, to:

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ANTONIO C. RAIMUNDO, ESQ.